

# **EXHIBIT D**

**BOND SCHOENECK & KING PLLC**

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*Attorneys for Defendant Worldwide Flight Services, Inc.*

SUPERIOR COURT OF THE STATE OF NEW JERSEY  
COUNTY OF MERCER: LAW DIVISION

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PAULA BURKE-GREEN-WARREN,

Plaintiff,

v.

WORLDWIDE FLIGHT SERVICES, INC., INDIGO  
PARTNERS & FRONTIER AIRLINES HOLDINGS, INC.  
d/b/a FRONTIER AIRLINES,

Defendants.

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MER-L-002081-22

**DEFENDANT**  
**WORLDWIDE FLIGHT**  
**SERVICES, INC.'s**  
**FIRST REQUEST FOR**  
**ADMISSION TO**  
**PLAINTIFF**

**TO:** William J. Fox, Esq.  
Law Offices of William J. Fox, P.C.  
1626 Pine Street  
Philadelphia, Pennsylvania, 19103  
*Attorneys for Plaintiff*

**COUNSEL:**

Please take notice that pursuant to Rule 4:22-1, Defendant WORLDWIDE FLIGHT SERVICES, INC., hereby directs the following requests for admission to Plaintiff PAULA BURKE-GREEN-WARREN (“Plaintiff” or “You”). Plaintiff must answer this request for admissions in writing, pursuant to the New Jersey Court Rules, and consistent with the Instructions set forth below. Plaintiff’s objections and responses are due within thirty (30) days of service of this request pursuant to Rule 4:22-1]. Please take notice that if you fail to object or respond, each of the matters as to which an admission is requested shall be deemed admitted, unless by the above-

mentioned deadline you have acted or otherwise moved with regard to these requests in accordance with Rule 4:22-1.

### **INSTRUCTIONS**

1. Pursuant to Rule 4:22-1, You must respond to these requests for admission within thirty (30) days after service.

### **REQUESTS FOR ADMISSION**

**REQUEST NO. 1:** Admit that you are seeking more than \$75,000 in total damages in this case.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

By: \_\_\_\_\_/s/\_\_\_\_\_

Samuel G. Dobre, Esq.

*Attorneys for Defendant*

**WORLDWIDE FLIGHT SERVICES, INC**

600 Third Avenue, 22<sup>nd</sup> Floor

New York, New York 10016

(646) 253-2320

[sdobre@bsk.com](mailto:sdobre@bsk.com)

Date: February 15, 2023

SUPERIOR COURT OF THE STATE OF NEW JERSEY  
COUNTY OF MERCER: LAW DIVISION

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PAULA BURKE-GREEN-WARREN,

MER-L-002081-22

Plaintiff,

v.

WORLDWIDE FLIGHT SERVICES, INC., INDIGO  
PARTNERS & FRONTIER AIRLINES HOLDINGS, INC.  
d/b/a FRONTIER AIRLINES,

Defendants.

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**CERTIFICATE OF SERVICE**

I, Samuel G. Dobre, hereby certify that on February 15, 2023, I caused to be filed a true and correct copy of the foregoing DEFENDANT WORLDWIDE FLIGHT SERVICES, INC.'s FIRST REQUEST FOR ADMISSION TO PLAINTIFF, via First Class Mail by enclosing a true and correct copy of said document in a securely sealed, postage prepaid, properly addressed mailer and depositing same in an official depository of the United States Postal Service and electronically via e-mail to the following:

William J. Fox, Esq.  
Law Offices of William J. Fox, P.C.  
*Attorney for Plaintiff*  
1626 Pine Street  
Philadelphia, Pennsylvania, 19103  
[wjf@billfoxlaw.com](mailto:wjf@billfoxlaw.com)

By:   
Samuel G. Dobre, Esq